

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>JOHNNY M. HUNT,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 3:23-cv-00243</b>
	)	
<b>SOUTHERN BAPTIST CONVENTION;</b>	)	<b>Judge Campbell</b>
<b>GUIDEPOST SOLUTIONS LLC; and</b>	)	<b>Magistrate Judge Frensley</b>
<b>EXECUTIVE COMMITTEE OF THE</b>	)	<b>Jury Demand</b>
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	
	)	
<b>Defendants.</b>	)	

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**MOTION FOR LEAVE TO FILE UNDER SEAL**

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Pursuant to Rules 5.03 and 7.01 of the Local Rules of Court and the Amended Agreed Protective Order previously entered in this action (ECF Doc. No. 83), Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal the unredacted version of the Memorandum in Support of Motion to Compel, as well as certain exhibits thereto, submitted by Plaintiff on January 19, 2024 (ECF Doc. No. 107) until such time as the Court adjudicates the issues.

There are a total of seven (7) exhibits accompanying the aforementioned Memorandum in Support of Motion to Compel (ECF Doc. No. 107), three (3) of which have been designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Amended Agreed Protective Order (ECF Doc. No. 83). There are also portions of the Memorandum in Support of Motion to Compel itself that contain references to information that has been designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Amended Agreed

Protective Order, which has also resulted in the public filing of the Memorandum in Support of Motion to Compel in redacted form pursuant to Local Rule 5.03(c).

As set forth in the Joint Discovery Dispute Statement submitted by Plaintiff and Guidepost on January 9, 2024 (ECF Doc. No. 100) and Plaintiff's Motion to Compel (ECF Doc. No. 106), Plaintiff objects to and opposes Guidepost's "Highly Confidential – Attorneys' Eyes Only" designations in its document productions under the Amended Agreed Protective Order. Without conceding the propriety or the merits of the "Confidential" or "Highly Confidential – Attorneys' Eyes Only" designations by Guidepost, Plaintiff files the instant motion in an effort to ensure compliance with the Local Rules of the Court and the Amended Agreed Protective Order previously entered in this action on December 4, 2023 (ECF Doc. No. 83), until such time as the Court adjudicates the issues in the Joint Discovery Dispute Statement and Motion to Compel.

For the foregoing reasons, and without conceding the merits of the "Confidential" or "Highly Confidential – Attorneys' Eyes Only" designations by Guidepost, this Court should review the exhibits accompanying the Memorandum in Support of Motion to Compel (ECF Doc. No. 107) and the unredacted version of the Memorandum in Support of Motion to Compel under seal until such time as the Court adjudicates the issues set forth in the Motion to Compel submitted by Plaintiff on January 19, 2024 (ECF Doc. No. 106).

[SIGNATURE BLOCKS AND CERTIFICATE OF SERVICE TO FOLLOW]

Dated: January 19, 2024

Respectfully submitted,

s/ Andrew Goldstein

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## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be electronically filed with the Clerk of the Court on January 19, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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